



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
BUREAU OF SOLID WASTE MANAGEMENT

851 Kossman Building  
100 Forbes Avenue  
Pittsburgh, Pennsylvania 15222-1376



(412) 565-5023

October 8, 1982

Dr. Philip K. Masciantonio, Vice Pres.  
U.S. Steel Corp.  
600 Grant Street  
Pittsburgh, PA 15230

RE: EPA ID No. PAD000824730  
Facility Name:  
U.S. Steel Corp.  
USS Chemicals  
Neville Island, PA 15225

Dear Dr. Masciantonio:

~~=====~~ This letter constitutes a formal request for Part B of your application for Hazardous Waste Management Facility Permit under the Hazardous Waste Management Regulations, 25 Pa. Code Chapter 75, Subchapter D, for the facility referenced above. This request is made under the authority of Section 75.265(z)(6) of the regulations. You should refer to the hazardous waste management regulations that appeared in the Pennsylvania Bulletin dated September 4, 1982, which was recently mailed to you for the requirements of the Part B application. Your Part B application must be submitted no later than six months from the date of this notice. If there is information that is being claimed as confidential, indicate this according to the requirements of Section 75.265(z)(16).

Enclosed are reference checklists for your Part B application that are to be used to insure your application contains the minimum information required. These checklists are to be used to assist you in your Part B application and our subsequent review, although the checklists are not a substitute for reviewing and addressing the hazardous waste regulations themselves. Because you may be anticipating additional facilities at your location, we have included checklists for every type of facility covered by the Department requirements. Please use only those checklists that apply to the types of facilities for which you are making application.

Previously, you have received a letter from the U.S. Environmental Protection Agency requesting this submission. Your Part B application will be reviewed for a hazardous waste management TSD Permit by each agency until the Commonwealth of Pennsylvania receives Phase II Interim Authorization under the RCRA Program to solely administer a permitting program.

October 8, 1982

You should submit the Part B application to both agencies for their concurrent review. This would require that the hazardous waste requirements under Pennsylvania regulations as well as the hazardous waste management requirements under the Federal program would have to be addressed.

When completed please transmit your application and five copies (or seven copies if there is an incineration facility) to our office, and if you have any questions or desire to have a pre-application conference, please contact us.

Sincerely,

Charles A. Duritsa  
Regional Solid Waste Manager

CAD/ksw

Enclosures

cc: Regional File  
Central File  
County Office  
~~Chron~~

U.S. Steel Corp  
 PAO 00082-4730  
 Activity

CONFIDENTIAL  
 INFORMATION  
 IS CONTAINED

CHECKLIST

<u>Activity</u>	<u>Date Initiated</u>	<u>Date Completed</u>	<u>Project Officer</u>	<u>Comment</u>
<u>For Existing Facilities</u>				
Part A received	11/19/80			
Part B requested	9/2/82			
Part B received				
<u>New Facilities Only</u>				
Part A and B Received Completeness Determinations made and project decision schedule mailed out for new major facilities				
<u>All Facilities</u>				
Reviewed for required information (against checklist on Part B contents				
Requested additional information				
Received more data required to make permit issuance decisions				
Additional information requested				
Additional information received				
Letter sent confirming submission of complete application				
Public Notice of draft permit or intent to deny published				
Public comments due				
Public comments forwarded to administrative record				
Public Hearing requested				
Public Hearing held				
Permit Issued/Denied				



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

SEP 02 1982

Certified Mail  
Return Receipt Requested

Dr. Philip X. Masciantonio, Vice Pres.  
U.S. Steel Corp.  
600 Grant St.  
Pittsburgh, PA 15230

Re: EPA Identification No. PAD 00 082 4730  
Facility Name: U.S. Steel Corp.  
USS Chemicals  
Neville Island, PA 15225

Dear Dr. Masciantonio:

This letter constitutes a formal request for Part B of your application for a hazardous waste management facility permit under the Resource Conservation and Recovery Act (RCRA) for the facility referenced above. This request is made under the authority of regulation 40 CFR § 122.22(a).

Enclosed for your reference is a list of the items which constitute Part B as applicable to your facility type. These items must be submitted by March 2, 1983. If any of this information is being submitted under a claim of confidentiality, please indicate this fact. (For more information on confidentiality see regulation 40 CFR Part 2.)

Should you have any questions about these requirements, please contact Ms. Shirley Bulkin on 215/597-4269 or the address shown above.

You should be aware that the Commonwealth of Pennsylvania is applying to EPA for Phase II interim authorization to administer the State hazardous waste facility permitting program in lieu of the Federal program. Until such a time as Pennsylvania actually receives authorization, both Federal and State programs will coexist.

You will receive a request for a State permit application from the Commonwealth of Pennsylvania. The State regulations may differ from the Federal regulations. We encourage the applicant to become aware of State permit application requirements. For further information concerning the State requirements, the applicant should contact Mr. Gary Galida of the Department of Environmental Resources, Bureau of Solid Waste Management in Harrisburg at 717/787-7381.

Sincerely yours,

Stephen R. Wassersug  
Director, Air & Waste Management Division

Enclosure: List of Part B Requirements  
Part 264 Standards

<b>RECORD OF COMMUNICATION</b>	<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
	(Record of item checked above)	
<b>TO:</b> A. SPINOLA U.S. STEEL CORP.	<b>FROM:</b> PAUL J. GOTHOLD EPA REGION III KCRA	<b>DATE</b> 4 SEPT 1981 <b>TIME</b> 3:00 PM
<b>SUBJECT</b> PART A SUBMITTAL - NEVILLE ISLAND PLANT.		
<b>SUMMARY OF COMMUNICATION</b> SPOKE TO MR. SPINOLA - HE SAID THE REVISION SUBMITTED AUG 5, 1981 WAS <u>ONLY</u> FOR THE PURPOSE OF INSURING THAT THE DRUM STORAGE OF K023 WAS INCLUDED IN ORIGINAL SUBMISSION.		
<b>CONCLUSIONS, ACTION TAKEN OR REQUIRED</b>		
<b>INFORMATION COPIES</b> <b>TO:</b>		



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

August 25, 1981

Dr. Philip X. Masciantonio  
U.S. Steel Corporation-USS Chemicals Division  
600 Grant Street  
Pittsburgh, PA 15230

Dear Dr. Masciantonio:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 125 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.12 and 122.15.

If you have any questions concerning this letter, please write to the address shown or call Bill Walsh at 215/597-1230.

Sincerely yours,

*Shirley D. Bulkin*  
Shirley D. Bulkin

Chief, Administrative Support Section  
Permit Enforcement Branch

Enclosure

CONDITIONS OF OPERATION DURING  
INTERIM STATUS

Date Prepared: August 25, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

1. Facility name, location, and EPA Identification Number.

Name: U.S. Steel Corporation-USS Chemicals

Location: Neville Island Plant  
Neville Island, PA 15225

EPA I.D. No.: PAD 00 082 4730

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Dr. Philip X. Masciantonio

Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

<u>PROCESS</u>	<u>DESIGN CAPACITY</u>
<u>T03</u>	<u>300 Gals/Hr.</u>
<u>S02</u>	<u>22,000 Gals.</u>
<u>S02</u>	<u>60,000 Gals.</u>
<u>S01</u>	<u>1,000,000 Gals.</u>

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

<u>U147</u>	<u>U190</u>	<u>U028</u>	<u>U031</u>	<u>U069</u>
<u>U107</u>	<u>K023</u>	<u>P120</u>	<u>      </u>	<u>      </u>



LAW DEPARTMENT



600 GRANT STREET  
PITTSBURGH, PENNSYLVANIA 15230  
CABLE: USSCOLAW PGHPA

August 21, 1981

Ms. Shirley Bulkin  
U. S. Environmental Protection Agency,  
Region III  
RCRA Administrative Support Section  
6th and Walnut Streets  
Philadelphia, Pennsylvania 19106

Re: United States Steel Corporation,  
USS Chemicals Neville Island Plant

Dear Ms. Bulkin:

This is in response to a telephone call from Joanne Cassidy of your office relating to an Interim Status Letter to be sent to the above facility. Ms. Cassidy was concerned with the fact that J. Robert Ferguson, Jr., who signed the RCRA permit application on behalf of U. S. Steel, has retired from the Corporation. Mr. Ferguson's functions regarding environmental matters, including hazardous wastes, has been assumed by Dr. Philip X. Masciantonio, Vice President - Environment and Energy.

The above applies to all permit applications signed by Mr. Ferguson, not only the application for the Neville Island plant. If you have any questions concerning this matter, please call me at (412) 433-2923.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "STEPHAN K. TODD".

Stephan K. Todd  
Attorney

SKT/jrh

*8/25 - Copy of letter placed in U.S. Steel file*

RECORD OF COMMUNICATION		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
TO:		FROM:	
<i>Stephen Kovalak</i>	<i>Joanne Cassidy</i>	DATE <i>8/19/81</i>	TIME
SUBJECT			
SUMMARY OF COMMUNICATION  <div style="font-family: cursive; font-size: 1.2em; min-height: 200px;"> <p>Called re return of I.S. letter. Mr. Ferguson is no longer there. Mr. Philip L. Masciantonio will be handling environmental matters. She will check with company lawyers &amp; have letter sent changing owner's name.</p> </div>			
CONCLUSIONS, ACTION TAKEN OR REQUIRED			
INFORMATION COPIES TO:			



*United  
States  
Steel  
Corporation*

600 GRANT STREET  
PITTSBURGH, PENNSYLVANIA 15230

J. DAVID MONIOT  
MANAGER  
ENVIRONMENTAL CONTROL—EAST

August 5, 1981

U. S. Environmental Protection Agency  
Region III  
6th and Walnut Streets  
Philadelphia, Pennsylvania 19106

Re: Part A RCRA Hazardous Waste Permit

ENVIRONMENTAL BRANCH

Gentlemen:

Attached please find completed and revised, a Part A application for the United States Steel Chemicals Neville Island Plant located in your region. The application has been revised to reflect current hazardous waste handling practices at Neville Island.

The application requests a permit for the area listed below:

<u>Area</u>	<u>Operation</u>	<u>Hazardous Component</u>
Phthalic Anhydride	Store light ends from the distillation of Phthalic Anhydride - material purchased from Koppers *	Phthalic Anhydride

\* Material is being recycled so only the storage operation is applicable under the regulations.

Very truly yours

*Anthony A. Spinola*

Anthony A. Spinola  
Environment Engineer  
Environment & Energy Department

AAS/nmh  
Attachment

<div style="display: flex; justify-content: space-between; align-items: center;"> <div style="text-align: center;"> <p><b>GENERAL INFORMATION</b> Consolidated Permit Program (Read the "General Instructions" before starting.)</p> </div> <div style="text-align: right;"> <p><b>EPA ID. NUMBER</b></p> <p><b>PAD000824730</b></p> </div> </div>	
<p><b>PLEASE PLACE LABEL IN THIS SPACE</b></p> <p>INFORMATION ALREADY OBTAINED THIS SECTION IS UNNECESSARY</p>	
<p><b>GENERAL INSTRUCTIONS:</b> If a pre-printed label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the space provided. Also, if any of the information is missing, fill in the area to the left of the label space. The information that should appear, please provide it in the space provided below. If the label is missing and you have not completed the information, please provide it in the space provided below. If the label is missing and you have not completed the information, please provide it in the space provided below.</p>	
<p><b>A. Do you have a permit to handle hazardous waste?</b> (FROM 2)</p> <p><b>B. Do you have a permit to handle hazardous waste?</b> (FROM 2)</p> <p><b>C. Do you have a permit to handle hazardous waste?</b> (FROM 2)</p> <p><b>D. Do you have a permit to handle hazardous waste?</b> (FROM 2)</p> <p><b>E. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>F. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>G. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>H. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p>	<p><b>I. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>J. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>K. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>L. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>M. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>N. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>O. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>P. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>Q. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>R. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>S. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>T. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>U. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>V. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>W. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>X. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>Y. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p> <p><b>Z. Do you or will this facility treat, store, or dispose of hazardous waste?</b> (FROM 2)</p>
<p><b>III. NAME OF FACILITY</b></p> <p><b>1</b> <b>SKIP</b> USS CHEMICALS DIVISION USSTEEL</p>	
<p><b>IV. FACILITY CONTACT</b></p> <p><b>2</b> <b>2</b> SEROKIS P PLANT MANAGER <b>412 771 6200</b></p>	
<p><b>V. FACILITY MAILING ADDRESS</b></p> <p><b>3</b> <b>3</b> NEVILLE ISLAND PLANT</p>	
<p><b>VI. FACILITY LOCATION</b></p> <p><b>4</b> <b>4</b> NEVILLE ISLAND <b>PA 15225</b></p>	
<p><b>5</b> <b>5</b> NEVILLE ISLAND PLANT</p>	
<p><b>6</b> <b>6</b> NEVILLE ISLAND <b>PA 15225</b></p>	

VII. SIC CODES (4-digit, in order of priority)

A. FIRST

B. SECOND

7 2 8 1 8 (specify)

Industrial Organic Chemicals

7 (specify)

C. THIRD

D. FOURTH

7 (specify)

7 (specify)

## VIII. OPERATOR INFORMATION

A. NAME

USS CHEMICALS DIVISION USSTEEL

Is this name listed in Part VII-A and C?

☒ YES ☐ NO

B. TYPE OF OPERATION (Enter the appropriate letter into the answer box; if "Other", specify)

FEDERAL M-F-PUBLIC (other than federal or state)

(specify)

STATE M-F-PUBLIC (other than federal or state)

P

PRIVATE O-OTHER (specify)

4 1 2 7 7 1 6 2 0 0

NEVILLE ISLAND PLANT

NEVILLE ISLAND

PA 1 5 2 2 5

0 0 0 3 8 3 2

P P

C. TYPE OF OPERATION (Enter the appropriate letter into the answer box; if "Other", specify)

E. OTHER (specify)

0 U See Attached (specify)

D. RCRA (Hazardous Waste)

E. OTHER (specify)

0 R (specify)

## X. MAP

Attach to this application a map showing the site of the area extending to at least one mile beyond the outline of the facility. The location of each of its existing and proposed intake and discharge points, treatment, storage, and disposal facilities, and each well where it injects fluids underground, surface or subsurface water bodies in the area, and the location of any other features for precise requirements.

## XII. NATURE OF OPERATIONS (Provide a brief description)

Manufacture of industrial organic chemicals specifically fumaric acid, maleic anhydride, phthalic anhydride, plasticizers and unsaturated polyester resins.

## XIII. CERTIFICATION BY SIGNER

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that I am aware of the responsibility of those persons immediately responsible for obtaining the information contained in this application. I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME &amp; OFFICIAL TITLE (type or print)

B. SIGNATURE

C. DATE SIGNED

P. X. Masciantonio, Vice President  
Environment & Energy



8-3-81

## XIV. USE FOR OFFICIAL USE ONLY

U. S. ENVIRONMENTAL PROTECTION AGENCY  
CONSOLIDATED PERMITS PROGRAM  
GENERAL INFORMATION

Form 1 - General

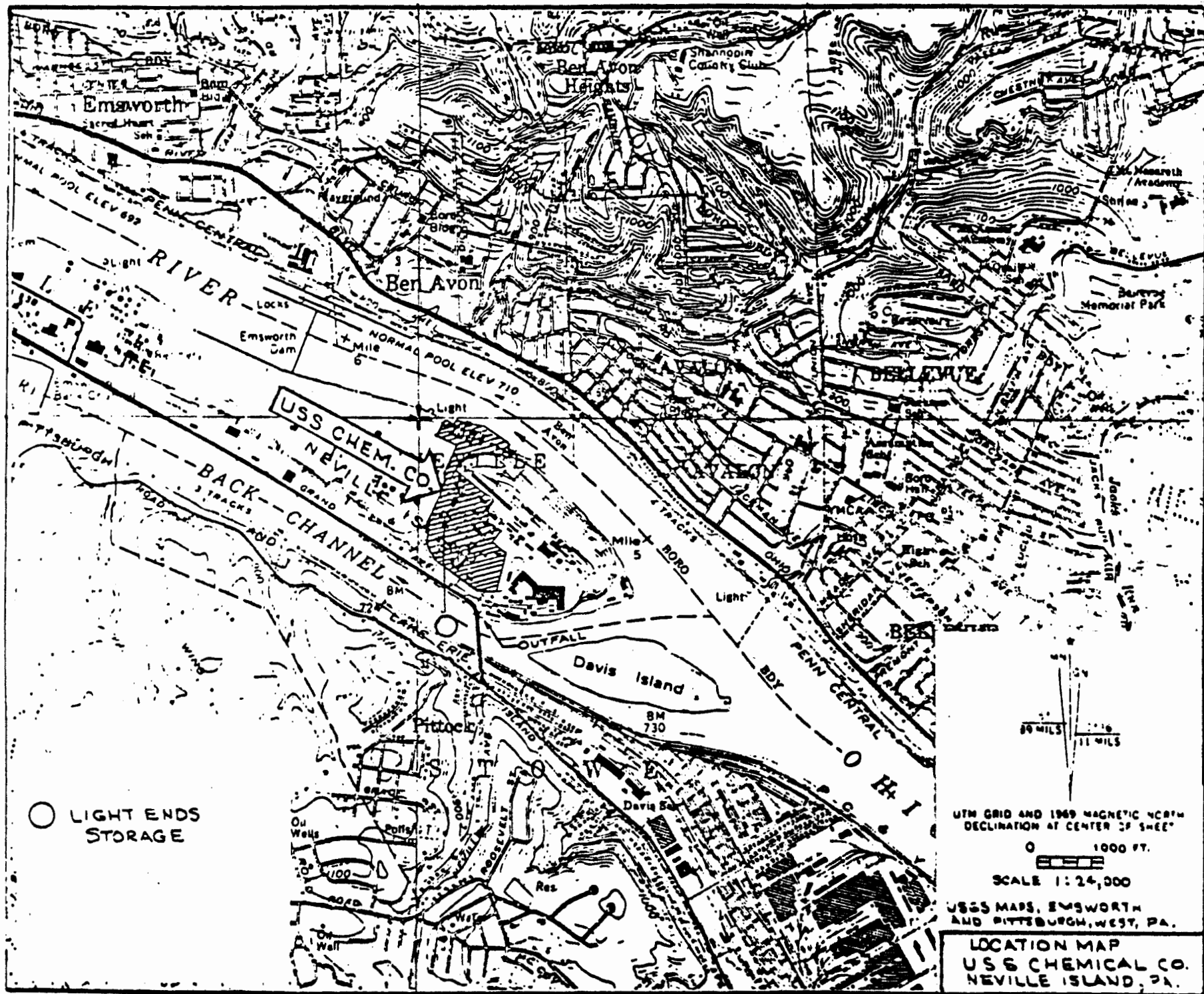
Section X - Existing Environmental Permits

Part E - Other

Operating Permits Issued By: Allegheny County Health Department  
Bureau of Air Pollution Control  
Allegheny County, Pennsylvania

<u>PERMIT NUMBER</u>	<u>EQUIPMENT</u>
7035003 013 00900	Steam Boiler
7035003 013 31300	Benzene Storage Tank
7035003 013 28700	Fumaric Acid Reactor
7035003 013 76201	Resin Plasticizer Production - Train No. 4
7035003 013 76202	Resin Plasticizer Production - Train No. 2
7035003 013 76203	Resin Plasticizer Production - Train No. 1
7035003 013 76204	Resin Plasticizer Production - Train No. 3
7035003 013 76205	Polyester Resins Plant
7035003 013 98600	Fluid Bed Chemical Reactor - Phthalic Anhydride
7035003 013 99701	Waste Gas Oxidizer - Maleic Anhydride No.1,2,3
7035003 013 99702	Waste Gas Oxidizer - Maleic Anhydride No. 4





UTM GRID AND 1969 MAGNETIC NORTH DECLINATION AT CENTER OF SHEET

0 1000 FT.

SCALE 1:24,000

USGS MAPS, EMSWORTH AND PITTSBURGH, WEST, PA.

LOCATION MAP  
US CHEMICAL CO.  
NEVILLE ISLAND, PA.

**III. PROCESSES – CODES AND DESIGN CAPACITIES**

**A. PROCESS CODE** – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

**B. PROCESS DESIGN CAPACITY** – For each code entered in column A enter the capacity of the process.

- 1. AMOUNT** – Enter the amount.
- 2. UNIT OF MEASURE** – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Storage:</b>			<b>Treatment:</b>		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided: Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
<b>Disposal:</b>					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	H
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	G
GALLONS PER DAY	U	LITERS PER HOUR	N		

**EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below):** A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

EPA Form 3510-3 (6-80)



**III. PROCESSES (continued)**

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

**IV. DESCRIPTION OF HAZARDOUS WASTES**

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE

CODE

POUNDS . . . . .

P

TONS . . . . .

T

METRIC UNIT OF MEASURE

CODE

KILOGRAMS . . . . .

K

METRIC TONS . . . . .

M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "Included with above" and make no other entries on that line.

3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO. JZ	A. EPA HAZARD. WASTENO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)		D. PROCESSES				
	1. PROCESS CODES (enter)							2. PROCESS DESCRIPTION (if a code is not entered in D(1))				
X-1	K	0	5	4	900	P		T 0 3	D 8 0			
X-2	D	0	0	2	400	P		T 0 3	D 8 0			
X-3	D	0	0	1	100	P		T 0 3	D 8 0			
X-4	D	0	0	2								Included with above

EPA I.D. NUMBER (enter from page 1)										FOR OFFICIAL USE ONLY									
W P A D 0 0 0 8 2 4 7 3 0										W D U P									
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)										V. PROCESS DESCRIPTIONS									
1	A. EPA HAZARD WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESS CODES (enter)				E. PROCESS DESCRIPTION (if code is not entered in D, enter description)								
	1	2	3	4			1	2	3	4	1	2	3	4					
1	K	0	2	3	480	T	S	0	2										
2																			
3																			
4																			
5																			
6																			
7																			
8																			
9																			
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20																			
21																			
22																			
23																			
24																			
25																			

## IV. DESCRIPTION OF HAZARDOUS WASTES

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 3) 111100

F	P	A	D	0	0	0	8	2	4	7	3	0	V/A	C	6
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16

## V. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

## VI. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

## VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, &amp; seconds)

4	0	3	0	0	0	0
65	66	67	68	69	70	71

LONGITUDE (degrees, minutes, &amp; seconds)

8	0	0	5	0	0	0
72	73	74	75	76	77	78

## VIII. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code &amp; no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

## IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

P. X. Masciantonio, Vice Pres.  
Environment & Energy

B. SIGNATURE



C. DATE SIGNED

8-3-81

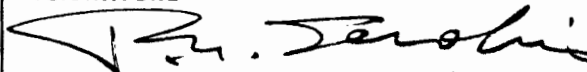
## X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

P. M. Serokis

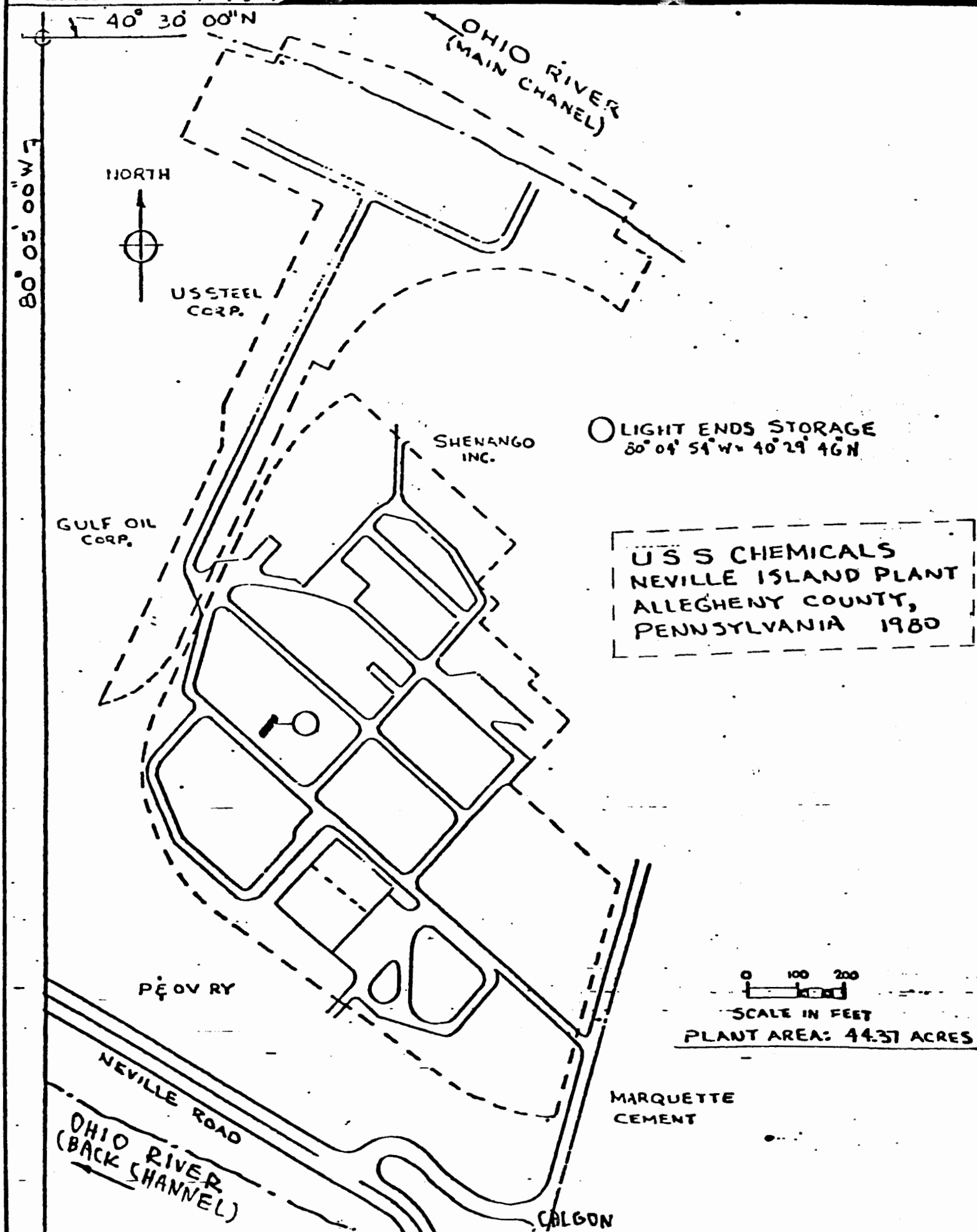
B. SIGNATURE



C. DATE SIGNED

7/24/81

## V. FACILITY DRAWING (see page 4)



HAZARDOUS WASTE PERMIT APPLICATION: FORM 3-RCRA

SECTION VI - PHOTOGRAPHS



PHTHALIC ANHYDRIDE DISTILLATION LIGHT ENDS STORAGE TANK



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

Mr. J. R. Ferguson, Jr.  
U. S. Steel Corporation-USS Chemicals Division  
600 Grant Street  
Pittsburgh, PA 15230

Dear Mr. Ferguson:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

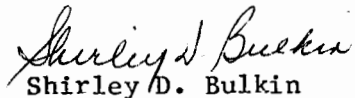
A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please write to the address shown or call Bill Walsh at 215/597-1230.

Sincerely yours,



Shirley D. Bulkin  
Chief, Administrative Support Section  
Permit Enforcement Branch

Enclosure

CONDITIONS OF OPERATION DURING  
INTERIM STATUS

Date Prepared: July 28, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

I. Facility name, location, and EPA Identification Number.

Name: Mr. J. R. Ferguson, Jr. - Senior Vice President

Location: Neville Island Plant  
Neville Island, PA 15225

EPA I.D. No.: PAD 00 082 4730

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Mr. J. R. Ferguson, Jr. - Senior Vice President

Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

<u>PROCESS</u>	<u>DESIGN CAPACITY</u>
<u>T03</u>	<u>300 Gals/Hr.</u>
<u>S02</u>	<u>22,000 Gals.</u>
<u>S02</u>	<u>60,000 Gals.</u>
<u>S01</u>	<u>1,000,000 Gals.</u>

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

<u>U147</u>	<u>U190</u>	<u>U028</u>	<u>U031</u>	<u>U069</u>
<u>U107</u>	<u>K023</u>	<u>P120</u>		





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

JUL 28 1981

Mr. J. R. Ferguson, Jr.  
U. S. Steel Corporation-USS Chemicals Division  
600 Grant Street  
Pittsburgh, PA 15230

Dear Mr. Ferguson:

This is to acknowledge that the Environmental Protection Agency has completed processing the information submitted in your Part A Hazardous Waste Permit Application. It is the Agency's opinion, based on the assumption that the information submitted is complete and accurate, you as an owner or operator of a hazardous waste management facility have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for Interim Status. EPA has not verified the information submitted. If it is determined that the information is incomplete or inaccurate, you may be asked to provide additional information or in certain circumstances it may be determined that you do not qualify for interim status. In addition, this notice does not preclude a citizen from taking legal action under the provisions of Section 7002 of RCRA.

A facility not meeting the requirements for interim status under Section 3005 of RCRA may be required to close until such time as a hazardous waste permit is issued. Interim status may also be terminated, according to procedures in 40 CFR Part 124, if the owner or operator fails to furnish additional information which EPA requests in order to process a permit application.

As an owner or operator of a hazardous waste management facility, you are required to comply with the interim status standards as prescribed in 40 CFR Parts 122 and 265 or with State rules and regulations in those States which have been authorized under Section 3006 of RCRA. In addition, you are reminded that operating under interim status does not relieve you from the need to comply with all applicable State and local requirements.

The enclosure to this letter identifies the processes your facility may use, their design capacities, and types of waste your facility may accept during interim status. This information was obtained from the Part A Permit Application. If you wish to handle new wastes, change processes, increase the design capacity of existing processes, or change ownership or operational control of the facility, you may do so only as provided in 40 CFR Sections 122.22 and 122.23.

If you have any questions concerning this letter, please write to the address shown or call Bill Walsh at 215/597-1230.

Sincerely yours,

*Shirley D. Bulkin*

Shirley D. Bulkin  
Chief, Administrative Support Section  
Permit Enforcement Branch

Enclosure

CONDITIONS OF OPERATION DURING  
INTERIM STATUS

Date Prepared: July 28, 1981

The information shown below is based solely on the information that the owner and operator of this facility submitted in Part A of the Hazardous Waste Permit Application. This is not a determination by EPA that this facility is an environmentally acceptable facility for treating, storing or disposing of the hazardous wastes listed below.

1. Facility name, location, and EPA Identification Number.

Name: Mr. J. R. Ferguson, Jr. - Senior Vice President

Location: Neville Island Plant  
Neville Island, PA 15225

EPA I.D. No.: PAD 00 082 4730

II. EPA considers the following to be the owner or operator of the facility and therefore the person(s) who must comply with the requirements set forth in 40 CFR Parts 122 and 265.

Owner's Name: Mr. J. R. Ferguson, Jr. - Senior Vice President

Operator's Name:

III. During the period of interim status, the facility may use only the following processes for treating, storing or disposing of hazardous waste, up to the design capacities that are indicated.

<u>PROCESS</u>	<u>DESIGN CAPACITY</u>
<u>T03</u>	<u>300 Gals/Hr.</u>
<u>S02</u>	<u>22,000 Gals.</u>
<u>S02</u>	<u>60,000 Gals.</u>
<u>S01</u>	<u>1,000,000 Gals.</u>

IV. During the period of interim status, the facility may handle only the hazardous wastes with the following EPA Hazardous Waste Numbers, and/or solid waste exhibiting hazardous characteristics with the following EPA Hazardous Waste Numbers.

<u>U147</u>	<u>U190</u>	<u>U028</u>	<u>U031</u>	<u>U069</u>
<u>U107</u>	<u>K023</u>	<u>P120</u>	<u>      </u>	<u>      </u>



**USS  
Chemicals**

Division of United States Steel Corporation

PITTSBURGH, PENNSYLVANIA 15225  
412-771-5200

NEVILLE ISLAND PLANT

June 10, 1981

Pennsylvania Department of  
Environmental Resources  
Division of Hazardous Wastes  
P.O. Box 2063  
Harrisburg, Penna. 17120

Gentlemen:

On May 1, 1981, one load of "Waste Acid, Liquid, NOS (Fumaric, Maleic Acids)" was shipped from the USS Chemicals Plant at Neville Island. Our EPA ID number is PAD000824730. The material is classified "Corrosive" and the load weighed 52,600 pounds. The waste was transported to the Ohio Liquid Disposal treatment plant, OHDO20273819, in Vickery, Ohio for disposal. The load was shipped under Pennsylvania Hazardous Waste Manifest number PAA 2392795 (copy attached).

Due to problems with manifest handling at the disposal site, the signed off copy of the manifest was lost before it could be returned to USS Chemicals. I have investigated this incident and confirmed with a disposal site representative (Jean Molyet) that the waste load was properly delivered and accepted at the disposal site. The disposal site has provided me a written confirmation of proper disposal. Please note in your records that this waste load was properly handled according to Pennsylvania regulations.

Very truly yours,

Eugene R. Fluharty, P.E.  
Environmental Engineer

cdt

Attachment

ER-SWM-51

See cover sheet for instructions  
Please TYPE or PRINT clearly using  
a ball point pen--PRESS HARD  
PART A:

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

## HAZARDOUS WASTE MANIFEST

DOCUMENT NO. PA A 2392795

NAME	SITE ADDRESS	PHONE NO.	EPA I.D. NO.
GENERATOR			
TRANSPORTER NO. 1			
TRANSPORTER NO. 2 (IF ANY)			
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY			

IF MORE THAN TWO TRANSPORTERS ARE TO BE UTILIZED, FILL OUT THE FOLLOWING AS APPROPRIATE

THIS FORM IS NO. \_\_\_\_\_ OUT OF A TOTAL OF \_\_\_\_\_ THE FIRST MANIFEST DOCUMENT NO. IS PA

PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN NUMBER	FORM			QUANTITY	UNITS				CONTAINERS NO. TYPE	EPA HAZ CODE	EPA WASTE TYPE
			SOLID	LIQUID	GAS		GALLONS	CU YDS	POUNDS	TONS			
1	Corrosive	NA 1760									1 Bulk	C	0002
2													
3													
4													

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES OF A NON-HAZARDOUS NATURE INCLUDED IN SHIPMENT WHICH DO NOT HAVE TO BE MANIFESTED)

GENERATOR'S CERTIFICATION. This is to certify that the above named materials are properly classified, described, packaged, marked and labelled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U S EPA, and the State. The wastes described above were consigned to the transporter named. The TSD Facility can and will accept the shipment of hazardous waste, and has a valid permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.

GENERATOR'S SIGNATURE	TITLE	DATE SHIPPED	EXPECTED ARRIVAL DATE
	Maleic	10-1-91	MONTH DAY YEAR
DATE RECEIVED	TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT	TRANSPORTER NO. 1 H.W.T. ID (License) No.	PA' NUMBER
MONTH DAY YEAR			

COPY 3 Generator - Retained By Generator.

TEAR AT THIS DISPOSITION



## USS Chemicals

NEVILLE ISLAND PLANT

Division of United States Steel Corporation

PITTSBURGH, PENNSYLVANIA 15225  
412/771-6200

March 17, 1981

Pennsylvania Department of  
Environmental Resources  
Division of Hazardous Waste  
P.O. Box 2063  
Harrisburg, Pa. 17120

Gentlemen:

During December, 1980, three loads of "Distillation Bottoms From The Production of Phthalic Anhydride From Naphthalene - Waste No. K024" were shipped from the USS Chemicals plant at Neville Island. Our EPA ID number is PAD000824730. These loads were transported by Municipal Industrial Disposal Co., PAD000436014, to the U. S. Steel, Clairton Works, PAD004498010. Loads were shipped under Pennsylvania Hazardous Waste Manifest numbers PAA0466303, PAA0465813, and PAA0465846 (copies attached).

Due to problems with manifest processing, the signed off copies of these manifests were lost before they could be returned to USS Chemicals. We have traced the manifests and determined that the waste loads were properly delivered and accepted at the Clairton Works. The transporter has a signed off copy "6" of each of these manifests to verify proper delivery. Please note in your records that USS Chemicals has confirmed delivery of these waste loads.

Very truly yours,

Eugene R. Fluharty, P.E.  
Environmental Engineer

cdt

## HAZARDOUS WASTE MANIFEST

DOCUMENT NO. PA A 04663

NAME	SITE ADDRESS	PHONE NO.	EPA I.D. NO.
GENERATOR Chemicals	Netille Island, Pa., 15225	412-771-6200	PA 000 824 73
TRANSPORTER NO. 1 MID Co.	Buena Vista, Pa., 15018	412-461-4900	PA 000 436 01
TRANSPORTER NO. 2 (IF ANY)			
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY U.S. Steel Corp.	Clairton, Pa., 15025	412-233-5040	PA 004 498 01

IF MORE THAN TWO TRANSPORTERS ARE TO BE UTILIZED, FILL OUT THE FOLLOWING AS APPROPRIATE

THIS FORM IS NO. \_\_\_\_\_ OUT OF A TOTAL OF \_\_\_\_\_ THE FIRST MANIFEST DOCUMENT NO. IS PA

PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN NUMBER	FORM			QUANTITY	UNITS				CONTAINERS NO. TYPE	EPA HAZ CODE	EPA WASTE	
			SOLID	LIQUID	GAS		GALLONS	CU YDS	POUNDS	TONS				
Hazardous Waste, Solid, NOS (Phthalic Anhydride)	0114	HA 9189	X			204.5					1	RO	T	K01

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES OF A NON-  
HAZARDOUS NATURE INCLUDED IN SHIPMENT WHICH DO NOT HAVE TO BE MANIFESTED)

GENERATOR'S CERTIFICATION. This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U.S. EPA, and the State wastes described above were consigned to the transporter named. The TSD Facility can and will accept the shipment of hazardous waste, and has a permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.

GENERATOR'S SIGNATURE <i>Robert F. Schreiner</i>	TITLE Phthalic Anhydride Foreman	DATE SHIPPED 12-22-80	EXPECTED ARRIVAL DATE 12-25-80
DATE RECEIVED 12-26-80 MONTH DAY YEAR	TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT <i>[Signature]</i>	TRANSPORTER NO. 1 H.W.T. ID (License) No. PA 43601	

COPY 2 Generator State - Mailed By Generator.

TEAR AT THIS PERFORATION

## PART B:

TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF DELIVERY AND NON TAMPERING WITH SHIPMENT		DATE DELIVERED MONTH DAY	
DATE RECEIVED MONTH DAY YEAR	TRANSPORTER NO. 2 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT	TRANSPORTER NO. 2 H.W.T. ID (License) No. PA	NUMBER 43601
TRANSPORTER NO. 2 SIGNATURE AND CERTIFICATION OF DELIVERY AND NON TAMPERING WITH SHIPMENT		DATE DELIVERED MONTH DAY	
TREATMENT STORAGE OR DISPOSAL FACILITY INDICATION OF ANY DIFFERENCES BETWEEN MANIFEST AND SHIPMENT OR LISTING OF REASONS FOR AND DISPOSITION OF REJECTED MATERIALS			
GENERATOR'S EPA I.D. NO.		EXPECTED DISPOSAL DATE	
TSD FACILITY SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT		DATE RECEIVED/REJECT MONTH DAY	

See cover sheet for instructions  
Please TYPE or PRINT clearly using  
a ball point pen—PRESS HARD

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

HAZARDOUS WASTE MANIFEST

DOCUMENT NO PA A 0465813

PART A:

NAME	SITE ADDRESS	PHONE NO	EPA I.D. NO.
GENERATOR Chemicals	Neville Island, Pa., 15225	412-771-5200	PA 000 824 73
TRANSPORTER NO 1 MLB Co.	Buena Vista, Pa., 15016	412-661-4900	PA 000 436 01
TRANSPORTER NO 2 (IF ANY)			
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY U. S. Steel Corp.	Clairton, Pa., 15025	412-733-3040	PA 000 498 01

IF MORE THAN TWO TRANSPORTERS ARE TO BE UTILIZED, FILL OUT THE FOLLOWING AS APPROPRIATE

THIS FORM IS NO. 1 OUT OF A TOTAL OF 1 THE FIRST MANIFEST DOCUMENT NO. IS PA

PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN NUMBER	FORM			QUANTITY	UNITS				CONTAINERS		EPA HAZ CODE	EPA WASTE
			SOLID	LIQUID	GAS		GALLONS	CU YDS	POUNDS	TONS	NO	TYPE		
1. Hazardous Waste, Solid, NO. 1 (Phthalic Anhydride)	ORM-E	NA 9189	X			20		X			1	RD	T	K 0 1
2														
3														
4														

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES OF A NON-  
HAZARDOUS NATURE INCLUDED IN SHIPMENT WHICH DO NOT HAVE TO BE MANIFESTED)

GENERATOR'S CERTIFICATION. This is to certify that the above named materials are properly classified, described, packaged, marked and labeled  
and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U.S. EPA, and the State.  
Wastes described above were consigned to the transporter named. The TSD Facility can and will accept the shipment of hazardous waste, and has a  
permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.

GENERATOR'S SIGNATURE <i>S. H. Korachuk</i>	TITLE Phthalic Anhydride Foreman	DATE SHIPPED 12-26-80	EXPECTED ARRIVAL DATE MONTH DAY YEAR SAINT
DATE RECEIVED MONTH DAY YEAR 12 26 80	TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT <i>T. T. T.</i>	TRANSPORTER NO. 1 H.W.T. ID (License) No.	PA 456011 NUMBER

COPY 2 Generator State - Mailed By Generator.

PART B:

TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF DELIVERY AND NON-TAMPERING WITH SHIPMENT			DATE DELIVERED MONTH DAY YEAR	
DATE RECEIVED MONTH DAY YEAR	TRANSPORTER NO. 2 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT		TRANSPORTER NO. 2 H.W.T. ID (License) No.	PA 456011 NUMBER
TRANSPORTER NO. 2 SIGNATURE AND CERTIFICATION OF DELIVERY AND NON-TAMPERING WITH SHIPMENT			DATE DELIVERED MONTH DAY YEAR	
TREATMENT STORAGE OR DISPOSAL FACILITY INDICATION OF ANY DIFFERENCES BETWEEN MANIFEST AND SHIPMENT OR LISTING OF REASONS FOR AND DISPOSITION OF REJECTED MATERIALS				HANDLING METHOD 1 2 3 4
GENERATOR'S EPA I.D. NO.			EXPECTED DISPOSAL DATE	
TSD FACILITY SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT			DATE RECEIVED/REJECT MONTH DAY YEAR	

In case of an emergency or spill immediately call the National  
Response Center (800) 424-8802 and the PA DER (717) 787-4343

DOCUMENT NO. PA A 0465813

COPY 2 Generator State Mailed By TSD Facility.



See cover sheet for instructions  
Please TYPE or PRINT clearly using  
a ballpoint pen - PRESS HARD  
PART A

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

HAZARDOUS WASTE MANIFEST

DOCUMENT NO PA A 046584

NAME	SITE ADDRESS	PHONE NO	EPA I.D. NO.
GENERATOR S. Chemicals	Haville Island, Pa., 15125	412-771-6000	PA 00008247
TRANSPORTER NO 1 MID Co.	Bucna Vista, Pa., 15018	412-461-1900	PA 00004360
TRANSPORTER NO 2 (IF ANY)			
TREATMENT, STORAGE OR DISPOSAL (TSD) FACILITY U. S. Steel Corp.	Clairton, Pa., 15025	412-233-5010	PA 00004918

IF MORE THAN TWO TRANSPORTERS ARE TO BE UTILIZED, FILL OUT THE FOLLOWING AS APPROPRIATE

THIS FORM IS NO. \_\_\_\_\_ OUT OF A TOTAL OF \_\_\_\_\_ THE FIRST MANIFEST DOCUMENT NO. IS PA

PROPER US DOT SHIPPING NAME	US DOT HAZARD CLASS	UN NUMBER	FORM			QUANTITY	UNITS				CONTAINERS NO TYPE		EPA HAZ CODE	EPA WASTE	
			SOLID	LIQUID	GAS		GALLONS	CU YDS	POUNDS	TONS					
1 Hazardous Waste, Solid, NO. 1 (Phthalic Anhydride)	ORM-E	NA 9189	X			20			X			1	RO	T K	0
2															
3															
4															

SPECIAL HANDLING INSTRUCTIONS INCLUDING CONTAINER EXEMPTION (i.e. IDENTIFICATION OF ADDITIONAL WASTES OF A NON-  
HAZARDOUS NATURE INCLUDED IN SHIPMENT WHICH DO NOT HAVE TO BE MANIFESTED)

GENERATOR'S CERTIFICATION. This is to certify that the above named materials are properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation, U.S. EPA, and the State. The TSD Facility can and will accept the shipment of hazardous waste, and has a permit to do so. I certify that the foregoing is true and correct to the best of my knowledge.

GENERATOR'S SIGNATURE <i>S. H. Kowalski</i>	TITLE Phthalic Anhydride Foreman	DATE SHIPPED 12 29 80	EXPECTED ARRIVAL DATE Same
DATE RECEIVED 12 29 80	TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT <i>Mr. Peter K. Baird</i>	TRANSPORTER NO. 1 H.W.T. ID (License) No.	PA 45401

COPY 2 Generator State - Mailed By Generator.  
TEAR AT THIS PERFORATION

PART B:

TRANSPORTER NO. 1 SIGNATURE AND CERTIFICATION OF DELIVERY AND NON TAMPERING WITH SHIPMENT			DATE DELIVERED MONTH DAY	
DATE RECEIVED MONTH DAY YEAR	TRANSPORTER NO. 2 SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT		TRANSPORTER NO. 2 H.W.T. ID (License) No.	PA
TRANSPORTER NO. 2 SIGNATURE AND CERTIFICATION OF DELIVERY AND NON TAMPERING WITH SHIPMENT			DATE DELIVERED MONTH DAY	
TREATMENT STORAGE OR DISPOSAL FACILITY INDICATION OF ANY DIFFERENCES BETWEEN MANIFEST AND SHIPMENT OR LISTING OF REASONS FOR AND DISPOSITION OF REJECTED MATERIALS				HANDLING METHOD 1 2 3 4
GENERATOR'S EPA I.D. NO.		EXPECTED DISPOSAL DATE		
TSD FACILITY SIGNATURE AND CERTIFICATION OF RECEIPT OF SHIPMENT		TITLE		DATE RECEIVED/REJECT MONTH DAY

In case of an emergency or spill immediately call the National Response Center (800) 424-8502 and the PA. DER (717) 787-4343

DOCUMENT NO. PA A 046584

COPY 2 Generator State Mailed By TSD Facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.  
Philadelphia, Pa. 19106

**SUBJECT:** RCRA Inspection November 24, 1980  
Neville Island Plant, USS Chemical Division of USS  
Pittsburgh, PA. 15225  
PAD000824730

**DATE:** MAR 6 1981

**FROM:** Gil Horwitz *GH*  
Environmental Engineer

**TO:** File

**Thru:** Robert Collings *RC*  
Water & RCRA Enforcement Section (3EN32)

Based upon a review of the RCRA inspection report for the facility referenced above, I have determined that no further action is required at this time.

Interim Checklist for Inspection of ISD Facilities

Name of Facility: Neville Island Plant, USS Chemical, Division of USS  
 Address: Pittsburgh, Penn 15225  
 Facility Contact and Telephone Number: Mr. Eugene R. Fluharty 412-771-6200  
 Facility's EPA ID Number: PA D00082473

## Site Characterization

## STORER

Pile \_\_\_\_\_  
 Surface Impoundment \_\_\_\_\_  
 Drums ☒ \_\_\_\_\_  
 Tank, above ground ☒ \_\_\_\_\_  
 Tank, below ground \_\_\_\_\_  
 Other \_\_\_\_\_

## TREATER

Filtration \_\_\_\_\_  
 Incineration \_\_\_\_\_  
 Thermal Treatment \_\_\_\_\_  
 Volume Reduction \_\_\_\_\_  
 Recycling/Recovery ☒ \_\_\_\_\_  
 Chem/Phys/Bio Treatment \_\_\_\_\_  
 Waste Oil \_\_\_\_\_  
 Reprocessing \_\_\_\_\_  
 Solvent Recovery \_\_\_\_\_  
 Other \_\_\_\_\_

## DISPOSER

Landfill \_\_\_\_\_  
 Land Treatment \_\_\_\_\_  
 Surface Impoundment \_\_\_\_\_  
 Incineration ☒ \_\_\_\_\_  
 Other \_\_\_\_\_

Inspection Procedure

Pertinent Reg.  
 40 CFR Part:

- 265.13(b) 1. Facility has in place a waste analysis plan yes
- 265.13(a) a. plan enables facility to identify wastes being brought to the facility yes See ATT.
- b. plan enables off-site facility to confirm that wastes actually received are what is indicated on manifests yes See ATT 2
- 265.14 2. \*Facility has 24 hour surveillance system which monitors and controls entry to the active portion of the site; or has an artificial or natural barrier surrounding the active portion plus a means to control entry at all times yes
3. \*Facility has a sign at each entrance of the active portion with the statement "Danger - Unauthorized Personnel Keep Out" yes
- a. sign must be legible from a distance of 25 feet yes
- b. sign must be in English and in any other language predominant in the area yes
- 265.15(d) 4. Facility has an inspection log and a written schedule for inspecting all emergency equipment, security devices, and operating and structural equipment that are important to preventing, detecting, or responding to environmental or human health hazards yes

- 265.16 5. Facility has the following documents and records:
- 265.16(d)(1) a. the job title for each position at the facility related to hazardous waste management and the name of the employee filling each job yes
- 265.16(d)(2) b. a written job description for each position listed in (a) above yes
- 265.16(d)(3) c. a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in (a) above yes
- 265.32 6. \*Facility has the following equipment:
- 265.32(a) a. an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel yes
- 265.32(b) b. a device at the scene of operations capable of summoning emergency assistance from police, fire department, etc. yes
- 265.32(c)&(d) c. fire control equipment and an adequate supply of water yes  
foam GENERATING SYSTEM & WATER.
- 265.35 7. \*Facility has adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies yes  
All STORAGE OUTSIDE.
- 265.50 8. Facility must have a contingency plan with the following elements:
- 265.52(a) a. description of actions facility's personnel will take in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, or water. yes
- 265.52(c) b. a description of arrangements agreed to by local police, fire department, hospitals, contractors, and State and local emergency teams to provide assistance during emergency situations yes  
copy of CONTINGENCY PLAN SENT TO LOCAL police, fire DEPT. & HOSPITALS.
- 265.52(d) c. a list of names, addresses, and phone numbers of the facility emergency coordinator(s) yes  
ONE OF the five FOREMAN IN the THALIC ANhydride SECTION. INCLUDED IN CONTINGENCY PLAN
- 265.52(e) d. a list of all emergency equipment at the facility where such equipment is required yes
- 265.52(f) e. \*an evacuation plan for facility personnel yes
- 265.55 9. Facility must have at all times at least one employee either on call or on the site capable of coordinating all emergency response measures (emergency coordinator) yes
- a. name of emergency coordinator(s) yes  
ONE OF the five FOREMAN IN the THALIC ANhydride SECTION

- 265.73 10. Check for presence of a written operating record containing the following data:
- 265.73(b)(1) a. a description and the quantity of each hazardous waste received and the method and date of treatment, storage, or disposal this will be maintained. No shipment from Koppers has been received since Nov 19, 1980.
- 265.73(b)(2) b. the location of each hazardous waste within the facility and the quantity at each location yes
- 265.73(b)(3) c. records and results of waste analyses and treat tests performed on wastes coming into the facility yes
- 265.73(b)(4) d. summary reports and details of all incidents that require implementing the Contingency Plan has Never been Required
- 265.73(b)(5) e. records and results of inspections performed on facility emergency equipment, TSD systems, and hazardous waste areas form prepared & in use in each required area yes
- 265.112(a) 11. Check for presence of a closure plan at the facility yes
- 265.118(a) 12. Check for presence of a post-closure plan at the facility yes
- 265.71 13. \*\*Check that facility is following, and is familiar with, the manifest system company has been using a manifest system for more than one year.
- a. manifest copies are signed and dated yes
- b. a copy is given to the transporter yes
- c. a copy is sent to the generator yes
- d. a copy is retained and filed with the facility yes
14. Check for other problems at facility including:
- NO a. open fires
- NO b. fumes or gasses
- NO c. leaks or corrosion in containers or other storage structures
- None observed d. leachate to receiving streams
- Not evident e. malfunction of equipment
- NO f. heat generation
- NO g. bulging drums

15. Inspector's Comments COMPANY APPEARS TO BE WILLING, ABLE & READY TO COMPLY WITH ALL ASPECTS OF THE RCRA ACT OF 1976 AS AMENDED

\*This is not always a specific requirement; obtain justification in situations where the facility is not meeting the requirements.

\*\*These requirements do not pertain to on-site facilities unless such facilities also receive hazardous wastes from off-site sources.

INSPECTORS

James L. Bailey

Date Nov 24, 1980

Date \_\_\_\_\_

## Interim Checklist for Inspection of TSD Facility

Neville Island Plant, USS Chemical, Division of USS

### Attachments

- 1 Waste generated at USS Chemical is phthalic anhydride, which is re-distilled to recover usable product. Portion not recoverable is incinerated at an average rate of two gallons per minute or approximately 2800 gallons per day (chart recorder on incinerator).

The Koppers plant at Bridgeville, Pennsylvania also generates phthalic anhydride as a waste product. The two companies have an agreement where Koppers waste is trucked to USS Chemical for disposal. Normally there are two trucks a month or 40,000 pounds from Koppers combined with the 500,000 pounds generated at USS Chemical.

- 2 Truck contents from Koppers is sampled and tested in on-site laboratory (melt point and % benzoic acid by G.C.) before off-loading is allowed.

## Interim Checklist for Inspection of Generators

### Inspection Procedure

- 262.20 4.a. TSD facility for waste is identified.  
Chem-Clair, Inc. - Cleveland, Ohio  
Telephone No. 216/429-2401  
EPA I.D. No. OHD000724153

204 of location: HEVILIS, 10000 VINE, 10000 VINE, 10000 VINE  
 Address: Pittsburgh, Pa. 15227  
 Facility Contact and Telephone Number: Mr. Eugene R. Fluharty 412-474-6160

Generator's EPA ID Number: PA D000 824 Y3

### Inspection Procedure

Partinent Reg.

40 CFR 261.12

262.12

1. Is the generator presently treating, storing, disposing of, transporting, or offering for transport, hazardous waste? yes
- a. If no, explain: yes applies to all but transporting which is contract with

2. Generator moves hazardous waste for treatment, storage, or disposal on-site or off-site? (If on-site, interim checklist for both a generator and a facility must be completed.) yes

611 Site movement is via pump & pipe line to disposal. yes

262.20

3. Is a manifest system in operation, or has a manifest been developed for off-site shipment of hazardous wastes? yes

4. Check generator's manifest example for the following data:

- a. TSD facility for waste shipment is identified yes  
See attached
- b. manifest document number included yes
- c. generator's name, mailing address, telephone number, and EPA ID number is included yes
- d. name and EPA ID number of each transporter is included yes
- e. name, address, and EPA ID number of any TSD facility described in (a) above, as well as for any alternate facility listed as alternate. yes
- f. a description of the waste is included yes
- g. the quantity of each waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle is included yes
- h. the following certification appears and is signed by the generator: "This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the available regulations of the DOT and EPA." yes

202.34(a)(5) 5. Check whether the wastes being stored are for less than 90 days (exempt)

yes

If not:

a. Is the date upon which each period of accumulation began clearly marked on each container?

*Drums are tagged & dated as they are filled*

yes

b. Are the containers in good condition, i.e., no leaks or signs of corrosion?

yes

c. Are the containers marked as containing a hazardous waste? *Contents are labeled on tag.*

yes

*Hydrolytic placards put on prior to shipment.*

202.34(a)(5)

d. Does the generator have an emergency contingency plan for the wastes being stored? *included in overall contingency plan.*

yes

202.34(a)(5)

e. \*Does the generator have fire control equipment for the storage site? *five tower with foam generator equipment, several designated persons (water supply, fire hoses, etc.)*

yes

202.34(a)(5)

f. \*Does the generator have an internal communications or alarm system for the storage site, capable of providing immediate emergency instruction to facility personnel? *alarms, phones & hand held radios.*

yes

6. Inspector's Comments:

\*These are not definite requirements; the generator should be asked why such equipment is not in place.

Name of Inspector(s)

*James L. Bailey*

Date *Nov 24, 1980*

Date





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

EPA I.D. # PAD000324730

January 2, 1981

USS Chemicals Div - U.S. Steel  
Mr. P. Serokis  
Neville Island Plant  
Neville Island, Pa. 15225

Re: Acknowledgment of Application for  
a Hazardous Waste Permit

This is to acknowledge that the Environmental Protection Agency has received: (1) A notification pursuant to Section 3010 of the Resource Conservation and Recovery Act for the facility located at the address shown above; and (2) Part A of a Hazardous Waste Permit Application for that facility, including a signed statement that the operation of the facility, or its construction, began prior to November 19, 1980. While the information provided by these submissions has not been fully reviewed for completeness or accuracy, EPA will accept this information as an initial qualification for interim status pursuant to Section 3005 of the Act. If after further review of this information, EPA determines that the owner or operator did not fulfill all the requirements for interim status, EPA may treat the owner or operator as not having qualified for interim status pursuant to that section and will advise the owner or operator of that determination. Facility owners and operators with interim status must comply with the standards set forth at 40 CFR Part 265 until a permit is issued. Interim status may be terminated if the owner or operator fails to furnish any additional information requested by EPA in order to process a permit application.

Interim Checklist for Inspection of GeneratorsName of Facility: NEVILLE ISLAND PLANT USS CHEMICAL, DIVISION OF USSAddress: PITTSBURGH, PENN 15222Facility Contact and Telephone Number: Mr. Eugene R. FLU HARTY 412-771-6200Generator's EPA ID Number: PA D000 824730 USS Steel Corp. USS Chemicals Div. 5147Inspection ProcedurePertinent Reg.  
40 CFR Part:

- 262.12 1. Is the generator presently treating, storing, disposing of, transporting, or offering for transport, hazardous waste? yes  
*yes applies to all but transporting which is contracted out*  
 a. If no, explain: \_\_\_\_\_
2. Generator moves hazardous waste for treatment, storage, or disposal on-site or off-site? (If on-site, interim checklist for both a generator and a facility must be completed.) yes  
*ON SITE MOVEMENT IS VIA PUMP & PIPE LINE TO RECYCLE THEN TO INCINERATION. ALSO DRUMS TO OFF SITE DISPOSAL.*
- 262.20 3. Is a manifest system in operation, or has a manifest been developed for off-site shipment of hazardous wastes? yes
4. Check generator's manifest example for the following data:
- a. TSD facility for waste shipment is identified yes  
*see attached*
  - b. manifest document number included yes
  - c. generator's name, mailing address, telephone number, and EPA ID number is included yes
  - d. name and EPA ID number of each transporter is included yes
  - e. name, address, and EPA ID number of any TSD facility described in (a) above, as well as for any alternate facility listed yes  
*No ALTERNATE.*
  - f. a description of the waste is included yes
  - g. the quantity of each waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle is included yes
  - h. the following certification appears and is signed by the generator: "This is to certify that the above-named materials are properly classified, described, packaged, marked, and labeled and are in proper condition for transportation according to the available regulations of the DOT and EPA." yes

262.34

5. Check whether hazardous waste is being stored on-site for less than 90 days drums (55 gal)

yes

If so:

- a. Is the date upon which each period of accumulation began clearly marked on each container?

DRUMS ARE TAGGED & DATED AS THEY ARE FILLED

yes

- b. Are the containers in good condition, i.e., no leaks or signs of corrosion?

yes

- c. Are the containers marked as containing a hazardous waste? CONTENTS ARE WRITTEN ON TAG.

yes

APPROPRIATE PLACARDS PUT ON PRIOR TO SHIPMENT.

262.34(a)(5)

- d. Does the generator have an emergency contingency plan for the wastes being stored? INCLUDED IN OVERALL CONTINGENCY PLAN.

yes

262.34(a)(5)

- e. \*Does the generator have fire control equipment for the storage site? FIRE TRUCK WITH FOAM GENERATING EQUIPMENT, SEVERAL DESIGNATED STATIONS (WATER SUPPLY, FIRE HOSES, ETC)

yes

262.34(a)(5)

- f. \*Does the generator have an internal communications or alarm system for the storage site, capable of providing immediate emergency instruction to facility personnel? ALARMS, PHONES & HAND HELD RADIOS

yes

6. Inspector's Comments: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\*These are not definite requirements; the generator should be asked why such equipment is not in place.

Name of Inspector(s) James L. Bailey Date Nov 24, 1980

Date \_\_\_\_\_

### Interim Checklist for Inspection of TSD Facility

Neville Island Plant, USS Chemical, Division of USS

#### Attachments

- 1 Waste generated at USS Chemical is phthalic anhydride, which is re-distilled to recover usable product. Portion not recoverable is incinerated at an average rate of two gallons per minute or approximately 2800 gallons per day (chart recorder on incinerator).

The Koppers plant at Bridgeville, Pennsylvania also generates phthalic anhydride as a waste product. The two companies have an agreement where Koppers waste is trucked to USS Chemical for disposal. Normally there are two trucks a month or 40,000 pounds from Koppers combined with the 500,000 pounds generated at USS Chemical.

- 2 Truck contents from Koppers is sampled and tested in on-site laboratory (melt point and % benzoic acid by G.C.) before off-loading is allowed.

### Interim Checklist for Inspection of Generators

#### Inspection Procedure

- 262.20 4.a. TSD facility for waste is identified.  
Chem-Clair, Inc. - Cleveland, Ohio  
Telephone No. 216/429-2401  
EPA I.D. No. OHD000724153

Interim Checklist for Inspection of TSD Facilities

Name of Facility: NEVILLE ISLAND PLANT, USS Chemical DIVISION of USS  
 Address: Pittsburgh, PENN 15225  
 Facility Contact and Telephone Number: Mr. Eugene R. Fluharty 412-771-6200  
 Facility's EPA ID Number: PA D00082473

Site Characterization

STORER

Pile \_\_\_\_\_  
 Surface Impoundment \_\_\_\_\_  
 Drums ☒ \_\_\_\_\_  
 Tank, above ground ☒ \_\_\_\_\_  
 Tank, below ground \_\_\_\_\_  
 Other \_\_\_\_\_

TREATER

Filtration \_\_\_\_\_  
 Incineration \_\_\_\_\_  
 Thermal Treatment \_\_\_\_\_  
 Volume Reduction \_\_\_\_\_  
 Recycling/Recovery ☒ \_\_\_\_\_  
 Chem/Phys/Bio Treatment \_\_\_\_\_  
 Waste Oil \_\_\_\_\_  
 Reprocessing \_\_\_\_\_  
 Solvent Recovery \_\_\_\_\_  
 Other \_\_\_\_\_

DISPOSER

Landfill \_\_\_\_\_  
 Land Treatment \_\_\_\_\_  
 Surface Impoundment \_\_\_\_\_  
 Incineration ☒ \_\_\_\_\_  
 Other \_\_\_\_\_

Inspection Procedure

Pertinent Reg.  
 40 CFR Part:

- 265.13(b) 1. Facility has in place a waste analysis plan yes
- 265.13(a) a. plan enables facility to identify wastes being brought to the facility yes See ATT. 2
- b. plan enables off-site facility to confirm that wastes actually received are what is indicated on manifests yes See ATT 2
- 265.14 2. \*Facility has 24 hour surveillance system which monitors and controls entry to the active portion of the site; or has an artificial or natural barrier surrounding the active portion plus a means to control entry at all times yes
3. \*Facility has a sign at each entrance of the active portion with the statement "Danger - Unauthorized Personnel Keep Out" yes
- a. sign must be legible from a distance of 25 feet yes
- b. sign must be in English and in any other language predominant in the area yes
- 265.15(d) 4. Facility has an inspection log and a written schedule for inspecting all emergency equipment, security devices, and operating and structural equipment that are important to preventing, detecting, or responding to environmental or human health hazards yes

265.16 5. Facility has the following documents and records:

265.16(d)(1) a. the job title for each position at the facility related to hazardous waste management and the name of the employee filling each job yes

265.16(d)(2) b. a written job description for each position listed in (a) above yes

265.16(d)(3) c. a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position listed in (a) above yes

265.32 6. \*Facility has the following equipment:

265.32(a) a. an internal communications or alarm system capable of providing immediate emergency instruction to facility personnel yes

265.32(b) b. a device at the scene of operations capable of summoning emergency assistance from police, fire department, etc. yes

265.32(c)&(d) c. fire control equipment and an adequate supply of water yes  
from GENERATING SYSTEM & WATER

265.35 7. \*Facility has adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies yes  
ALL STORAGE OUTSIDE.

265.50 8. Facility must have a contingency plan with the following elements:

265.52(a) a. description of actions facility's personnel will take in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, or water. yes

265.52(c) b. a description of arrangements agreed to by local police, fire department, hospitals, contractors, and State and local emergency teams to provide assistance during emergency situations yes  
COPY OF CONTINGENCY PLAN SENT TO LOCAL POLICE, FIRE DEPT. & HOSPITALS.

265.52(d) c. a list of names, addresses, and phone numbers of the facility emergency coordinator(s) yes  
ONE OF THE FIVE FOREMAN IN THE THALIC ANHYDRIDE SECTION. INCLUDED IN CONTINGENCY PLAN

265.52(e) d. a list of all emergency equipment at the facility where such equipment is required yes

265.52(f) e. \*an evacuation plan for facility personnel yes

265.55 9. Facility must have at all times at least one employee either on call or on the site capable of coordinating all emergency response measures (emergency coordinator) yes

a. name of emergency coordinator(s) yes  
ONE OF THE FIVE FOREMAN IN THE THALIC ANHYDRIDE SECTION

265.73 10. Check for presence of a written operating record containing the following data:

- 265.73(b)(1) a. a description and the quantity of each hazardous waste received and the method and date of treatment, storage, or disposal this will be MAINTAINED. NO SHIPMENT FROM Koppers has been received since Nov 19, 1980.
- 265.73(b)(2) b. the location of each hazardous waste within the facility and the quantity at each location yes
- 265.73(b)(3) c. records and results of waste analyses and treat tests performed on wastes coming into the facility yes
- 265.73(b)(4) d. summary reports and details of all incidents that require implementing the Contingency Plan has Never been Required
- 265.73(b)(5) e. records and results of inspections performed on facility emergency equipment, TSD systems, and hazardous waste areas form prepared & in use in each required area. yes
- 265.112(a) 11. Check for presence of a closure plan at the facility yes
- 265.118(a) 12. Check for presence of a post-closure plan at the facility yes
- 265.71 13. \*\*Check that facility is following, and is familiar with, the manifest system Company has been using a manifest system for more than one year.
- a. manifest copies are signed and dated yes
- b. a copy is given to the transporter yes
- c. a copy is sent to the generator yes
- d. a copy is retained and filed with the facility yes

14. Check for Other problems at facility including:

- NO a. open fires
- NO b. fumes or gasses
- NO c. leaks or corrosion in containers or other storage structures
- None observed d. leachate to receiving streams
- Not evident e. malfunction of equipment
- NO f. heat generation
- NO g. bulging drums

15. Inspector's Comments COMPANY APPEARS TO BE WILLING, ABLE & READY TO COMPLY WITH ALL ASPECTS OF THE RCRA ACT OF 1976 AS AMENDED

\*This is not always a specific requirement; obtain justification in situations where the facility is not meeting the requirements.

\*\*These requirements do not pertain to on-site facilities unless such facilities also receive hazardous wastes from off-site sources.

INSPECTORS

James L. Bailey

Date Nov 24, 1980

Date \_\_\_\_\_

## Interim Checklist for Inspection of TSD Facility

Neville Island Plant, USS Chemical, Division of USS

### Attachments

- 1 Waste generated at USS Chemical is phthalic anhydride, which is re-distilled to recover usable product. Portion not recoverable is incinerated at an average rate of two gallons per minute or approximately 2800 gallons per day (chart recorder on incinerator).

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- 2 Truck contents from Koppers is sampled and tested in on-site laboratory (melt point and % benzoic acid by G.C.) before off-loading is allowed.

## Interim Checklist for Inspection of Generators

### Inspection Procedure

- 262.20 4.a. TSD facility for waste is identified.  
Chem-Clair, Inc. - Cleveland, Ohio  
Telephone No. 216/429-2401  
EPA I.D. No. OHD000724153





J. D. Moniot - Room 1876

## United States Steel

600 Grant Street, Pittsburgh, Pennsylvania 15230

*RCRA*

TO:

U. S. Environmental Protection Agency  
Region III  
6th and Walnut Streets  
Philadelphia, Pennsylvania 19106

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

FIRST CLASS MAIL

NOV 1981 REV. 674 51-0-0.0143  
EPA-700 551800

*Nov. 18, 1980 - postmark date*

**FORM 1**  
**GENERAL**

**EPA**

**ENVIRONMENTAL PROTECTION AGENCY**  
**GENERAL INFORMATION**  
Consolidated Permits Program  
(Read the "General Instructions" before starting.)

**LABEL ITEMS**

**I. EPA I.D. NUMBER**

**III. FACILITY NAME**

**V. FACILITY MAILING ADDRESS**

**VI. FACILITY LOCATION**

**Nov 1980 000547**

**PLEASE PLACE LABEL IN THIS SPACE**

**EPA I.D. NUMBER**

**F P A D 0 0 0 8 2 4 7 3 0**

**GENERAL INSTRUCTIONS**

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

**II. POLLUTANT CHARACTERISTICS**

**INSTRUCTIONS:** Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	*	B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	*
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X		*	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	*
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	*	H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	*
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	*	J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	*

**III. NAME OF FACILITY**

**1** **SKIP** **U S Steel Corp - New Castle**

**IV. FACILITY CONTACT**

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)		
<b>2</b>	<b>SEROKIS P PLANT MANAGER</b>	<b>4 1 2</b>	<b>7 7 1</b>	<b>6 2 0 0</b>

**V. FACILITY MAILING ADDRESS**

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
<b>3</b>	<b>NEVILLE ISLAND PLANT</b>	<b>NEVILLE ISLAND</b>	<b>PA</b>	<b>1 5 2 2 5</b>	

**VI. FACILITY LOCATION**

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN		D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
<b>5</b>	<b>NEVILLE ISLAND PLANT</b>	<b>ALLEGHENY</b>	<b>NEVILLE ISLAND</b>	<b>PA</b>	<b>1 5 2 2 5</b>			

CONTINUED FROM THE FRONT

## VII. SIC CODES (4-digit, in order of priority)

A. FIRST 7 2, 8, 1, 8 (specify) Industrial Organic Chemicals				B. SECOND 7 (specify)			
C. THIRD 7 (specify)				D. FOURTH 7 (specify)			

## VIII. OPERATOR INFORMATION

A. NAME 8 U S S C H E M I C A L S D I V I S I O N U S S T E E L												B. Is the name listed in Item VIII-A also the owner? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.) F - FEDERAL M - PUBLIC (other than federal or state) P (specify) S - STATE O - OTHER (specify) P - PRIVATE										D. PHONE (area code & no.) A 4 1 2 4 3 3 6 0 1 2			
E. STREET OR P.O. BOX 60 0 G r a n t S t r e e t													
F. CITY OR TOWN 8 P i t t s b u r g h								G. STATE P A		H. ZIP CODE 1 5 2 3 0		IX. INDIAN LAND Is the facility located on Indian lands? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

## X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water) 9 N 0 0 0 3 8 3 2						D. PSD (Air Emissions from Proposed Sources) 9 P					
B. UIC (Underground Injection of Fluids) 9 U						E. OTHER (specify) 9 S e e a t t a c h e d (specify)					
C. RCRA (Hazardous Wastes) 9 R						E. OTHER (specify) 9 (specify)					

## XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

## XII. NATURE OF BUSINESS (provide a brief description)

Manufacture of industrial organic chemicals specifically fumaric acid, maleic anhydride, phthalic anhydride, plasticizers and unsaturated polyester resins.

## XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print) J. R. Ferguson, Jr., Senior V.P. & Asst. to the President	B. SIGNATURE <i>J. R. Ferguson Jr.</i>	C. DATE SIGNED 11/17/82
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## COMMENTS FOR OFFICIAL USE ONLY

C	
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U. S. ENVIRONMENTAL PROTECTION AGENCY  
CONSOLIDATED PERMITS PROGRAM  
GENERAL INFORMATION

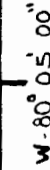
FORM 1 - GENERAL

SECTION X - EXISTING ENVIRONMENTAL PERMITS

PART E - OTHER

OPERATING PERMITS ISSUED BY: Allegheny County Health Department  
Bureau of Air Pollution Control  
Allegheny County, Pennsylvania

<u>Permit Number</u>	<u>Equipment</u>
7035003 013 00900	Steam Boiler
7035003 013 98600	Fluid Bed Chemical Reactor - Phthalic Anhydride
7035003 013 31300	Benzene Storage Tank
7035003 013 99701	Waste Gas Oxidizer - Maleic Anhydride No. 1, 2, 3
7035003 013 99702	Waste Gas Oxidizer - Maleic Anhydride No. 4
7035003 013 28700	Fumaric Acid Reactor
7035003 013 76203	Resin Plasticizer Production - Train No. 1
7035003 013 76202	Resin Plasticizer Production - Train No. 2
7035003 013 76204	Resin Plasticizer Production - Train No. 3
7035003 013 76201	Resin Plasticizer Production - Train No. 4
7035003 013 76205	Polyester Resins Plant



☐ (A) P. R. WASTE INCINERATOR  
☐ (B) LIGHT ENDS STORAGE  
☐ (C) ALCOHOL STORAGE  
☐ (D) WARE HOUSE (DRUM STORAGE)

UTM GRID AND 1969 MAGNETIC NORTH  
DECLINATION AT CENTER OF SHEET

0 1000 FT.

SCALE 1:24,000

USGS MAPS, EMMSWORTH  
AND PITTSBURGH, WEST, PA.

1980



FORM  
3  
RCRA



U.S. ENVIRONMENTAL PROTECTION AGENCY  
**HAZARDOUS WASTE PERMIT APPLICATION**  
Consolidated Permits Program  
(This information is required under Section 3005 of RCRA.)

1. EPA I.D. NUMBER  
F P A D 0 0 0 8 2 4 7 3 0 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS
23	24	29

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

☒ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☐ 2. NEW FACILITY (Complete item below.)

YR.	MO.	DAY
8	6	01

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR.	MO.	DAY

FOR NEW FACILITIES PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

☐ 1. FACILITY HAS INTERIM STATUS

☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Storage:</b>		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
<b>Disposal:</b>		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
<b>Treatment:</b>		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or inciner- ators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U

UNIT OF MEASURE	UNIT OF MEASURE CODE
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H

UNIT OF MEASURE	UNIT OF MEASURE CODE
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

D U P									
LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY		FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEAS- URE (enter code)				1. AMOUNT	2. UNIT OF MEAS- URE (enter code)	
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	T 0 3	300	E		7				
2	S 0 2	22,000	G		8				
3	S 0 2	60,000	G		9				
4	S 0 1	1,000,000	G		10				

**III. PROCESSES (continued)**

C: SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

**IV. DESCRIPTION OF HAZARDOUS WASTES**

**A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE      CODE  
POUNDS. . . . . P  
TONS. . . . . T

METRIC UNIT OF MEASURE      CODE  
KILOGRAMS. . . . . K  
METRIC TONS. . . . . M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous waste:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO. JZ	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY														
W P A D 0 0 0 8 2 4 7 3 0 T/A C I													W DUP T/A C 2 DUP														
IV. DESCRIPTION OF HAZARDOUS WASTES (continued)																											
WASTE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES																							
				1. PROCESS CODES (enter)																							
23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50
1	U 1 4 7	2,700	T											T 0 3													
2	U 1 9 0																										Included with above
3	U 0 2 8	1,010	T											S 0 2													
4	U 0 3 1																										
5	U 0 6 9																										
6	U 1 0 7																										Included with above
7	K 0 2 3	480	T											S 0 2													
8	P 1 2 0	64,000	P											S 0 1													
9																											
10																											
11																											
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**IV. DESCRIPTION OF HAZARDOUS WASTES** (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

9	8	7	6	5	4	3	2	1	0	9	8	7	6	5	4	3	2	1	0	T/A	C
F	P	A	D	0	0	0	8	2	4	7	3	0								6	

**V. FACILITY DRAWING**

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

**VI. PHOTOGRAPHS**

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

**VII. FACILITY GEOGRAPHIC LOCATION**

LATITUDE (degrees, minutes, &amp; seconds)

LONGITUDE (degrees, minutes, &amp; seconds)

4	0	3	0	0	0	0
55	56	57	58	59	-	71

8	0	0	5	0	0	0	
72	-	74	75	76	77	-	79

**VIII. FACILITY OWNER**

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

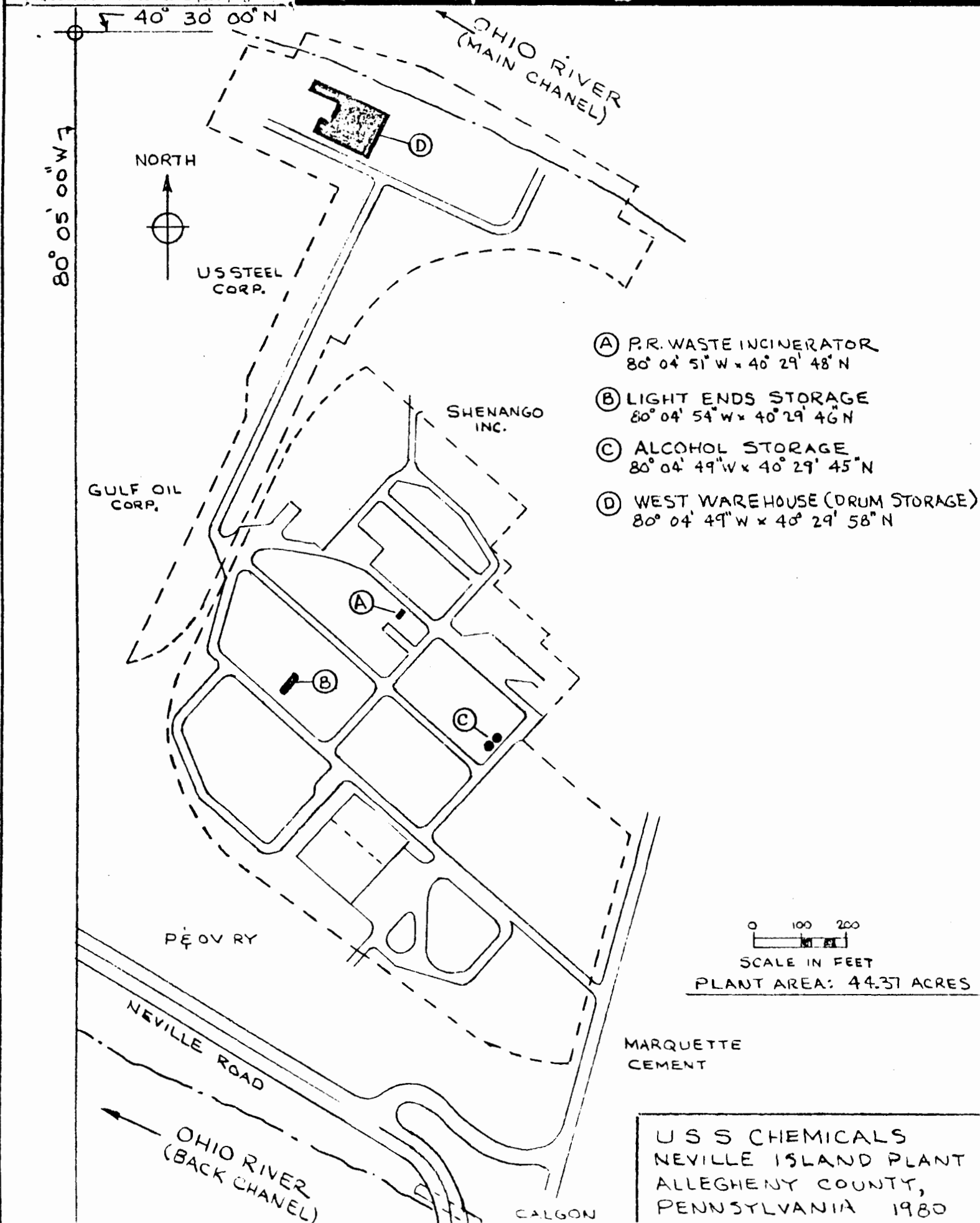
B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code &amp; no.)

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## V. FACILITY DRAWING (see page 4)





Aristech Chemical Corporation  
600 Grant Street, Room 2111  
Pittsburgh, PA 15230-0250  
412/433-7806

**Anthony F. Mastro**  
Executive Vice President -  
Administration  
Chief Financial Officer

March 28, 1988

Mr. John Haluszczyk  
Pennsylvania Department  
of Environmental Resources  
Bureau of Waste Management  
Highland Building  
121 South Highland Ave.  
Pittsburgh, PA 15206-3988

RE: Financial Assurance  
Aristech Chemical Corporation  
Neville Island Plant

Dear Mr. Haluszczyk:

I am the Chief Financial Officer of Aristech Chemical Corporation, 600 Grant Street, Pittsburgh, PA. 15230-0250. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage as specified in Title 25, Pennsylvania Code §75.342.

The firm identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated through the financial test specified in Title 25, Pennsylvania Code §75.342:

<u>EPA I.D.</u> <u>No.</u>	<u>Name</u>	<u>Address</u>
PAD 000824730	Neville Island Plant	Neville Island, PA 15225-1696

Facilities outside of the Commonwealth of Pennsylvania:

<u>EPA I.D.</u> <u>No.</u>	<u>Name</u>	<u>Address</u>
ARD 091691311	Jacksonville Plant	P.O. Box 686 1901 Redmond Rd. Jacksonville, AR 72076



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<u>EPA I.D. No.</u>	<u>Name</u>	<u>Address</u>
CAD 091933895	Colton Plant	291 W. Adams St. Colton, CA 92324
FLD 000654251	Bartow Plant	P. O. Drawer 2130 Bartow, FL 33830
KYD 092825538	Florence Plant	7350 Empire Drive Florence, KY 41042
NJD 001724488	Linden Plant	1711 Elizabeth Ave. West Linden, NJ 07036
OHD 005108477	Haverhill Plant	P.O. Box 127 Ironton, OH 45638

This firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on December 31. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements for the latest completed fiscal year, ended December 31, 1987.

Alternative I

- |   |                       |
|---|-----------------------|
| 1. Amount of annual aggregate liability coverage to be demonstrated             | <u>\$12,000,000</u>   |
| *2. Current assets  | <u>\$241,000,000</u>  |
| *3. Current liabilities   | <u>\$94,000,000</u>   |
| 4. Net working capital (line 2 minus line 3)                                    | <u>\$147,000,000</u>  |
| *5. Tangible net worth  | <u>\$362,700,000</u>  |
| *6. If less than 90% of assets are located in the U.S., give total U.S. assets. | <u>Not applicable</u> |



Mr. John Haluszczak

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	<u>Yes</u>	<u>No</u>
7. Is line 5 at least \$10 million?	<u>X</u>	_____
8. Is line 4 at least 6 times line 1?	<u>X</u>	_____
9. Is line 5 at least 6 times line 1?	<u>X</u>	_____
*10. Are at least 90% of assets located in the U.S.? If not, complete line 11.	<u>X</u>	_____
11. Is line 6 at least 6 times line 1?	<u>Not applicable</u>	

I hereby certify that this letter contains the information required for meeting the financial test set forth in Title 25 Pennsylvania Code §75.342(a).

As specified in Title 25, Pennsylvania Code §75.342(b), an applicant for self-insurance must submit a statement covering certain financial obligations in the last thirty-six months preceding its application. Aristech Chemical Corporation is a new, publicly owned corporation which began operating on December 4, 1986. Accordingly, the following statement covers the period from December 4, 1986 to the present:

- 1) Aristech has not defaulted on the payment of any preferred stock dividends, sinking fund installments, installment on any indebtedness for borrowed money, or payment of rentals under long-term leases;
- 2) Aristech has honored its obligations, if any, under all applicable self-insurance programs authorized by the statutes of the Commonwealth;
- 3) Aristech has honored its obligations, if any, under all applicable self-insurance programs implemented by other states and the Environmental Protection Agency consistent with 40 CFR §§264.147(f) and 265.147(f) (relating to liability requirements); and



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March 28, 1988

- 4) Aristech has not had commercial insurance cancelled for non-payment of premiums or fraud or failure to maintain a reasonable risk management program required by a commercial insurance underwriter as a condition of maintaining or renewing insurance coverage.

A handwritten signature in cursive script, reading "Anthony F. Mastro".

Anthony F. Mastro  
Executive Vice President -  
Administration and Chief  
Financial Officer

Date: 28 March 1988



**ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

•PAD000824730

INSTALLATION ADDRESS

USS CHEMICAL US STEEL CORP  
NEVILLE ISLAND PLANT  
NEVILLE ISLAND PA 15225  
  
NEVILLE ISLAND PLANT  
NEVILLE ISLAND PA 15225



ACKNOWLEDGEMENT OF NOTIFICATION  
OF REGULATED WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

81100082473

3/25/77

INSTALLATION ADDRESS

ARISTON CHURCH CONG  
200 MCVILLI RD  
PITTSBURGH, PA 15225  
CRAWLEY KILPATRICK BLVD ALBUQUERQUE

200 MCVILLI RD  
PITTSBURGH, PA 15225

OK